

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

HONG KONG LEYUZHEN TECHNOLOGY
CO. LTD,

Plaintiff,

v.

THE INDIVIDUALS, CORPORATIONS,
LIMITED LIABILITY
COMPANIES, PARTNERSHIPS AND
UNINCORPORATED ASSOCIATIONS
IDENTIFIED IN SCHEDULE A HERETO,
Defendants.

Case No. 1:24-cv-02939

Honorable Matthew F. Kennell

**ATTORNEY TIMOTHY T. WANG'S MOTION TO WITHDRAW AS COUNSEL FOR
CERTAIN DEFENDANTS**

Timothy T. Wang, attorney of Ni, Wang & Massand, PLLC, files this motion to withdraw as counsel of record for Defendants xinchengdongdongbianlidian, Fandee Branch Store and Quanzhoushizhinaguandidianzishangwuyouxiangongsi ("Defendants") in the above styled case.

I. BACKGROUND FACTS

On April 11, 2024, Plaintiff XYZ Corporation filed this action against various defendants identified in schedule A. Dkt. No. 1. On May 14, 2024, attorney Timothy T. Wang made an appearance on behalf of Defendants and other co-defendants. Dkt. No. 22. Shortly thereafter, these three Defendants notified attorney Timothy T. Wang of their intent to terminate the representation and substitute counsel.

II. LEGAL STANDARD

Attorney withdrawal is governed by the Northern District of Illinois Local Rules and the Illinois Rules of Professional Conduct. Local Rule 83.17 states: "The attorney of record may not

withdraw... without first obtaining leave of court.” Rule 1.16 of the Illinois Rules of Professional Conduct states: “a lawyer... shall withdraw from the representation of a client if... the lawyer is discharged.”

III. ANALYSIS

Attorney Timothy T. Wang has complied with Local Rule 83.17 by seeking leave of court to withdraw with this Motion. Further, good cause exists under Rule 1.16 for withdrawal because attorney Timothy T. Wang has been discharged by the clients. Moreover, it is believed that Defendants have or will be represented by other counsels on the record for this action.

IV. CONCLUSION

For the foregoing reasons, attorney Timothy T. Wang’s Motion to Withdraw should be granted.

DATED: May 21, 2024

Respectfully submitted,

/s/ Timothy T. Wang
Timothy T. Wang
Texas Bar No.: 24067927

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COUNSEL FOR DEFENDANTS

CERTIFICATE OF SERVICE

I hereby certify that on the 21st day of May, 2024, I electronically filed the foregoing document with the clerk of the court for the U.S. District Court, Northern District of Illinois, Eastern Division, using the electronic case filing system of the court. The electronic case filing system sent a “Notice of Electronic Filing” to the attorneys of record who have consented in writing to accept this Notice as service of this document by electronic means.

/s/ Timothy T. Wang
Timothy T. Wang